

EXHIBIT 1



Oliver Peer <oliver.peerfw@gmail.com>

Moore v. Cohen

Larry Klayman <klaymanlaw@gmail.com>

Fri, Apr 9, 2021 at 2:51 PM

To: bfeuerherd@nypost.com

Cc: Oliver Peer <oliverpeerfw@gmail.com>, leklayman <leklayman@gmail.com>

On Fri, Feb 12, 2021 at 11:49 AM Strom, Rachel <RachelStrom@dwt.com> wrote:

Counsel,

Pursuant to Section 4 of the Protective Order entered by Judge Cronan [ECF 104] in the above-referenced case, Defendants hereby designate the video of the deposition of Sacha Noam Baron Cohen as confidential, and therefore subject to the terms governing use of confidential information outlined in Sections 7-12 of the Protective Order. The designation is based on the fact that the video consists of footage of Cohen in a private residence.

We will provide confidentiality designations for the transcript itself, if any, within the time prescribed by the Protective Order.

Thank you.

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